

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JESSICA LITZINGER

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Plaintiff

\*

v.

\*

Case No.: JFM 02 CV 4115

BRADLEY MCGURK

\*

Defendant

\*

\* \* \* \* \*

MOTION TO ENLARGE TIME FOR  
PLAINTIFF'S SUMMARY JUDGMENT

Plaintiff, by and through her attorneys, Duane A. Verderaime, and Verderaime & DuBois, P.A., respectfully requests that the time for Plaintiff to file a summary judgment and response to defendant's summary judgment be extended for ten days.

1. Plaintiff's summary judgment, and response to defendant's summary judgment, was to be filed on or before September 17, 2004.

2. Due to personal conflicts over the next several days, plaintiff schedule has been impacted.

3. Additionally, plaintiff anticipates, and in the middle of drafting, a voluntary dismissal of some of the allegations in the complaint. Additional time is required to coordinate those issues with the response to defendant's summary judgment motion.

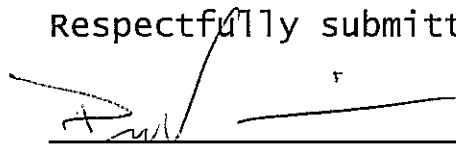
4. Defense counsel has been notified of the above and has no objection.

5. Plaintiff is requesting an extension from September 17, 2004 until September 27, 2004, and that in turn, defendant's response would be extended from October 1, 2004 until October 11, 2004.

6. Trial has been scheduled for December 21, 2004. The extension has no foreseen complications on the Court's schedule.

WHEREFORE, the plaintiff respectfully requests that this Honorable Court grant the Motion to Enlarge Time for Plaintiff's Motion for Summary judgment, and for Defendant's Response thereto.

Respectfully submitted,



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